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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Adali Arnulfo Escalante-Trujillo,

Defendant.

2:20-cr-00156-RFB-DJA

**Unopposed Motion to Dismiss only
Count 1 of the Indictment**

Count 1 of the Indictment charges only defendant Escalante-Trujillo with Continuing Criminal Enterprise in violation of 21 U.S.C. §§ 848(a), (b), and (c). ECF 1. The defendant is also charged with co-defendants in Counts 2 – 11, 13-15, 17-19, and 21 with Conspiracy to Distribute a Controlled Substance in violation of 21 U.S.C §§ 846, 841(a)(1), (b)(1)(A)(viii), Conspiracy to Deal in Firearms without a License in violation of 18 U.S.C. § 371, and related offenses. Counsel for Escalante-Trujillo was notified of this motion and does not object.

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1 Pursuant to Federal Rule of Criminal Procedure 48(a) and in the interest of justice,
2 the government hereby moves for leave of Court to dismiss only Count 1 in the Indictment
3 without prejudice. Defendant shall remain detained as previously ordered. ECF 66.

4 Respectfully submitted this 29th day of September, 2022.

5 JASON M. FRIERSON
6 United States Attorney

7 s/ Jacob H. Operskalski
8 JACOB H. OPERSKALSKI
9 Assistant United States Attorney
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United States of America,

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v.

Adali Arnulfo Escalante-Trujillo,

Defendant.

2:20-cr-00156-RFB-DJA

**[Proposed] Order Granting Motion to
Dismiss only Count 1 of the Indictment**

Pursuant to Federal Rule of Criminal Procedure 48(a) and in the interest of justice,
the United States hereby dismisses without prejudice only Count 1 in the Indictment.
Defendant shall remain detained as previously ordered.

JASON M. FRIERSON
United States Attorney

s/ Jacob H. Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

Leave of Court is granted for the filing of the above dismissal.

DATED this 14th day of October, 2022.



HONORABLE RICHARD F. BOULWARE, II.
UNITED STATES DISTRICT JUDGE